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CLERK U.S. DISTRICT COURT
DISTRICT OF ARIZONA

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,
vs.
Laquaysha Martin,
Defendant.

No. CR-25-00954-PHX-JJT (ASB)

INFORMATION

VIO: 18 U.S.C. § 1347
(Healthcare Fraud)
Count 1

18 U.S.C. § 981(a)(1)(C)
18 U.S.C. § 982(a)(7)
21 U.S.C. § 853
28 U.S.C. § 2461(c)
(Forfeiture Allegations)

THE UNITED STATES ATTORNEY'S OFFICE CHARGES:

At all times material to this information, within the District of Arizona and elsewhere:

Introduction

1. Between on or about January 1, 2022, and February 28, 2023, LAQUAYSHA MARTIN, acting primarily through her company BCFL Next Step (“Next Step”), defrauded the Arizona Health Care Cost Containment System (“AHCCCS”) out of approximately \$4 million by falsely billing for behavioral healthcare services. MARTIN primarily targeted the AHCCCS-eligible Native American population, often by recruiting them for behavioral healthcare services and either billing AHCCCS for services that were never provided at all or grossly overbilling for any services that were provided.

Individuals and Entities Involved

2. MARTIN is a resident of Arizona.

2. MARTIN directed the day-to-day operations of Better Choices 4 Life, LLC (“Better Choices”) between on or about January 20, 2020, and November 12, 2021, and also the day-to-day operations of Next Step between on or about January 1, 2022, and February 28, 2023.

3. Better Choices was organized in Arizona on September 30, 2019, as a “healthcare and social assistance” business.

4. MARTIN was listed in the Arizona Corporation Commission documents as the sole member, organizer, and statutory agent of Better Choices. The address for Better Choices was listed as *** South Country Club Drive, Mesa, Arizona, 85210.

5. Next Step was organized in Arizona on January 24, 2022, as an “other services” business.

6. Individual 1 was listed in the original Arizona Corporation Commission documents as the organizer, member and manager, and statutory agent of Next Step. The address for Next Step was listed as *** South Country Club Drive, Chandler, Arizona, 85249.

7. Individual 1 is MARTIN's romantic partner.

8. Next Step was managed and operated by MARTIN, utilizing the same infrastructure, including all employees and facilities of Better Choices.

9. Individual 1 and MARTIN were both signers on the Better Choices and Next Step bank accounts.

AHCCCS Registration

10. AHCCCS administers Medicaid healthcare programs to Arizona residents who meet certain income requirements. The federal government pays states for a percentage of Medicaid program expenditures. In 2022 and 2023, it was approximately 80 percent. Among other programs and plans, AHCCCS has an American Indian Health Program (“AIHP”) through which AHCCCS-enrolled Native Americans may receive healthcare services, including preventive and behavioral healthcare services.

11. AHCCCS providers are required to be registered, and Better Choices was registered under AHCCCS Provider ID ending in 0314. Between January 2020 and October 2021, Better Choices billed AHCCCS for services under the AIHP.

Investigation into Widespread AHCCCS Fraud

2. The AHCCCS Office of Inspector General (“OIG”) began investigating a widespread fraud in which residential and outpatient treatment centers recruited Native Americans and other indigent individuals to exploit the AIHP under AHCCCS. Because it was easier to enroll as a provider with AIHP than some other AHCCCS insurance programs, and because AIHP’s reimbursement rates for certain behavioral health services were sometimes higher than those of other programs, these treatment centers preferred patients who were enrolled in AIHP. In some cases, these treatment centers identified potential patients and enrolled the patients in AIHP or had the patients switch their existing AHCCCS insurance plan to AIHP, regardless of whether the patient was Native American.

Manner and Means of the Scheme

12. On or about November 12, 2021, Better Choices was suspended by AHCCCS, meaning it was no longer able to submit any claims for payment to access, based on a credible fraud allegation (“CAF”).

13. On April 15, 2022, MARTIN submitted a registration agreement for Next Step to AHCCCS with false registration information, designed to conceal the identity and prior AHCCCS history of MARTIN and the existence of Better Choices' suspension.

a. In registration forms, a document entitled “Provider Controlling Interest/Ownership” requests as “required disclosure information” the name and address of any person “with ownership or control interest,” and Individual1 was the sole person listed.

b. In registration forms, a document entitled “Add Owners Adverse Actions” requires disclosure of suspension, by Medicare and/or AHCCCS, of “all individuals and entities with an ownership or control interest; all agents, managing employees and key personnel.” In response, Individual 1 was the sole person listed, and the application provided negative responses for any adverse actions. The application did not list MARTIN as a managing employee or the suspension of Better Choices.

c. Next Step was approved in April 2022 as a provider under the AHCCCS Provider ID ending 1669.

14. On June 3, 2022, MARTIN filed an amendment to Next Step's Articles of Organization with the Arizona Corporation Commission to include MARTIN as a member and manager. No amendment to the AHCCCS provider agreement was ever submitted to AHCCCS, nor did MARTIN inform AHCCCS that she was running Next Step

Funds Received from AHCCCS

15. Next Step's bank accounts for the relevant period were Wells Fargo account ending 4930 and 6771. Bank records show deposits of approximately \$4 million during the relevant period.

16. Of the funds received by Next Step from AHCCCS during the relevant period, approximately 95% went to Better Choices. MARTIN used funds she received from AHCCCS to purchase a \$1,982,000 million property in Pinal County, Arizona, on or about September 23, 2022.

COUNT 1
Health Care Fraud
(18 U.S.C. § 1347)

17. The factual allegations in the preceding paragraphs are incorporated by reference and re-alleged as though fully set forth herein.

18. Between at least as early as January 1, 2022, and continuing through on or about February 28, 2023, in the District of Arizona and elsewhere, Defendant LAQUAYSHA MARTIN, knowingly and willfully executed and attempted to execute a scheme and artifice to defraud AHCCCS and to obtain by means of materially false and fraudulent pretenses, representations and promises, money and property owned by or under the custody or control of AHCCCS, a health care benefits program as defined in Title 18, United States Code, Section 24(b), in connection with the delivery of and payment for health care benefits, items, and services.

These acts were in violation of 18 U.S.C. § 1347.

FORFEITURE ALLEGATIONS

19. The factual allegations in the preceding paragraphs are incorporated by reference and re-alleged as though fully set forth herein

20. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(7), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c), and upon conviction of the offense alleged in Count 1 of this Information, defendant shall forfeit to the United States all right, title, and interest in any and all property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense, including, but not limited to the following:

- 176,484.64 in US currency seized by the United States from Navy Federal Credit Union account ending in 1184.
 - 197,006.96 in US currency seized by the United States from Navy Federal Credit Union account ending in 1173.
 - Real property located at 34490 N. Quail Run Lane, San Tan Valley, AZ 85140, with the following legal description: Pinal County, State of Arizona to wit: Tract "A", Quail Hollow Amended, a subdivision recorded in Book

1 10 of Maps, Page 12, records of Pinal County, Arizona. A.P.N. 210-04-1210
2 (443,286 SF).

3 If any of the above-described forfeitable property, as a result of any act or omission
4 of the defendant:

5 (1) cannot be located upon the exercise of due diligence,

6 (2) has been transferred or sold to, or deposited with, a third party,

7 (3) has been placed beyond the jurisdiction of the court,

8 (4) has been substantially diminished in value, or

9 (5) has been commingled with other property which cannot be divided without
10 difficulty, it is the intent of the United States to seek forfeiture of any other property of said
11 defendant(s) up to the value of the above-described forfeitable property, pursuant to Title
12 21, United States Code, Section 853(p).

13 All in accordance with Title 18, United States Code, Sections 981 and 982, Title 21,
14 United States Code, Section 853, Title 28, United States Code, Section 2461(c), and Rule
15 32.2, Federal Rules of Criminal Procedure.

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17 Respectfully submitted this 30th day of June, 2025.

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TIMOTHY COURCHAINE
United States Attorney
District of Arizona

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ADRIANA D. GENCO
KEVIN M. RAPP
Assistant U.S. Attorneys